



Order Filed on August 23, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**Robertson, Anschutz, Schneid, Crane & Partners
PLLC**

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Attorneys for Secured Creditor

Harold Kaplan (HK0226)

In Re:

Cosmo F. Terrigno,

Debtor,

Beatrice Terrigno,

Joint Debtor.

Case No.: 19-18303

Chapter: 13


Hearing Date: 08/17/2021

Judge: Andrew B. Altenburg Jr.

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby
ORDERED.

DATED: August 23, 2021



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Secured Creditor: JPMorgan Chase Bank, N.A.

Secured Creditor's Counsel: Robertson, Anschutz, Schneid, Crane & Partners PLLC

Debtors' Counsel: Robert Braverman

Property Involved ("Collateral"): 2018 Mazda CX-5 VIN: JM3KFBCM3J0460442

Relief sought:

- ☒ Motion for relief from the automatic stay
- ☐ Motion to dismiss
- ☐ Motion for prospective relief to prevent imposition of automatic stay against the collateral by debtor's future bankruptcy filings

For good cause shown, it is **ORDERED** that Secured Creditor's Motion is resolved, subject to the following conditions:

1. Status of post-petition arrearages:
 - The Debtors have brought their account current subsequent to the filing of the Motion for Relief from Stay filed on July 23, 2021.
2. Debtors must recommence post-petition payments as follows:
 - Beginning on August 22, 2021, regular monthly payments shall continue to be made in the amount of \$323.38.
3. Payments to the Secured Creditor shall be made to the following address(es):
 - Regular monthly payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department
P.O. Box 901032
Ft. Worth, Texas 76101-2032
 - Monthly cure payment: JPMorgan Chase Bank, N.A.
National Bankruptcy Department
P.O. Box 901032
Ft. Worth, Texas 76101-2032
4. In the event of Default:
 - Should the Debtor(s) fail to make any regular monthly payment and should same become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the

Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 13 Trustee, Chapter 7 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$188.00.

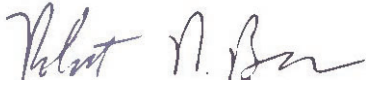
The fees and costs are payable:

■ Through the Chapter 13 plan.

☐ To the Secured Creditor within _____ days.

☐ Attorneys' fees are not awarded.

The undersigned hereby consent to the form and entry of the foregoing order.



Robert Braverman
Attorney for Debtor(s)
Date: 8/19/2021

/s/Harold Kaplan

Harold Kaplan
Attorney for Secured Creditor
Date: 8/20/2021